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Attorneys for Plaintiff Bimbo Bakeries USA, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH CENTRAL DIVISION**

BIMBO BAKERIES USA, INC.,)	
)	
Plaintiff,)	PLAINTIFF'S PROPOSED SPECIAL
)	VERDICT FORM
v.)	
)	Case No. 2:13-cv-00749-DN-DBP
LELAND SYCAMORE, TYLER)	
SYCAMORE, WILD GRAINS BAKERY,)	Judge David Nuffer
LLC, AND UNITED STATES BAKERY,)	
INC.,)	Magistrate Judge Dustin B. Pead
)	
Defendants.)	
)	

MEMBERS OF THE JURY:

Please answer the following questions according to the applicable burdens of proof as instructed by the Court. If you find the evidence weighs in favor of the issue presented according to the applicable burden of proof, answer “Yes.” If you find that the evidence does not weigh in favor of the issue under the applicable burden of proof, or that the evidence weighs against the issue presented under the applicable burden of proof, answer the question “No,” and follow the instructions regarding the remaining questions.

SPECIAL INTERROGATORIES TO THE JURY

FALSE ADVERTISING

1. Has US Bakery committed false advertising?

Answer Yes or No _____

If your answer is “Yes,” then go to Questions No. 2 and 3. If your answer is “No,” then continue to the questions on the next page under “Trade Secret Misappropriation.”

2. If you answered “Yes” to Question No. 1, what amount of damages do you award?

Amount _____

3. If you answered “Yes” to Question No. 1, do you find that USB’s false advertising was willful?

Answer Yes or No _____

Continue on to answer the questions under Trade Secret Misappropriation.

TRADE SECRET MISAPPROPRIATION

1. Have the following Defendants committed trade secret misappropriation?

Answer as to each of the following Defendants:

UNITED STATES BAKERY

Answer Yes or No _____

LELAND SYCAMORE

Answer Yes or No _____

TYLER SYCAMORE

Answer Yes or No _____

WILD GRAINS BAKERY, LLC

Answer Yes or No _____

If your answer is “Yes” for any Defendant, then go to Questions No. 2 and 3. If your answer is “No” for all defendants, then stop here and have the foreman sign and date this form.

2. For each defendant you answered “Yes” to in Question No. 1, what amount of damages do you award?

Answer as to each of the following Defendants:

UNITED STATES BAKERY

Amount _____

LELAND SYCAMORE

Amount _____

TYLER SYCAMORE

Amount _____

WILD GRAINS BAKERY, LLC

Amount _____

3. For each defendant you answered “Yes” to in Question No. 1, do you find that their trade secret misappropriation was willful?

Answer as to each of the following Defendants:

UNITED STATES BAKERY

Answer Yes or No _____

LELAND SYCAMORE

Answer Yes or No _____

TYLER SYCAMORE

Answer Yes or No _____

WILD GRAINS BAKERY, LLC

Answer Yes or No _____

SO SAY WE ALL.

Foreperson's signature Date:

Respectfully submitted this 24th day of August, 2017.

/s/ Juliette P. White

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CERTIFICATE OF SERVICE

I hereby certify that August 24, 2017, the foregoing **Plaintiff's Proposed Special Verdict Form** was served by filing a copy using the Court's ECF filing system, which will send notice of the filing to all counsel of record.

/s/ Juliette P. White